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 WOODS & ERICKSON, LLP

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:
 ANDREW B. PLATT and RUTH ANN PLATT,
 Debtors.

ANDREW B. PLATT,
 Appellant,
 v.
 WOODS & ERICKSON LLP,
 Appellee.

BAP No.: NV-21-1198

Case No.: 2:19-bk-17282-abl
 Adv. No.: 2:19-bk-01125-abl

Chapter 7

**APPELLEE'S DESIGNATION OF
 ADDITIONAL ITEMS TO BE
 INCLUDED IN THE RECORD**

Appellee, Woods & Erickson LLP, ("Appellee" or "Firm"), by and through its attorneys, Gerrard Cox Larsen, submits its Designation of Additional Items to be Included in the Record pursuant to Federal Rule of Bankruptcy Procedure 8009(a)(2).

Plaintiff's Trial Exhibits (as numbered, identified, and admitted at trial): ¹

3. 2012 Renaissance Academy Checkbook - identical production from WEW006755-006806 with improved resolution WEW007175-007226 **(034-085)**;
4. 12/12/2015 Email from Andrew Platt to Glen Woods proposing limited partner

¹ These are in addition to the Plaintiff's Trial Exhibits that the Appellant designated in his Designation of Record on Appeal from Bankruptcy Court, filed on September 21, 2021 as [Doc 126], which Appellee incorporates herein, except for Plaintiff's proposed Trial Exhibit 5, which was not admitted at trial, but was nonetheless identified by Appellant in his Designation of Record on Appeal from Bankruptcy Court. *Id.* at page 2.

- framework WEW012118 and 12/12/2015 - 1/18/2015 Emails between Andrew Platt and Glen Woods discussing limited partner framework proposal with proposed agreement attached WEW012119-WEW012123 **(086-091)**;
6. L&S Counselors Governing Documents PLATT 1920-1959 and 09/28/2017 L&S Counselors Ltd. corporate formation information with Nevada Secretary of State (using Boulder City address) WEW000001 **(093-133)**;
 7. Andrew Platt - January through December 2016 Accounting and Checks WEW006828-006870 **(134-176)**;
 11. Audio Recordings PLATT 1810 **(229-239)**;
 12. ACT Invoices May – July 2018 WEW012102-012111 **(240-249)**;
 13. 5/13/2018 Andrew Platt, Esq.'s Time Restored to Pro Law WEW012100-012101 **(250-251)**;
 14. 05/02/2018 L&S Bill to Boyd Martin (Invoice #127) 04/25/2018 Woods Erickson Letter to Andrew Platt WEW000544 WEW000542-000543 **(252-254)**;
 15. 04/06/2018 Email from Andrew Platt to Boyd Martin re: operating structure and filing for April WEW000553 **(255)**;
 16. 04/17/2018 Email from Kathy Jones to Andrew Platt and Adina Cox WEW000548-00549 04/17/2018 Email from Andrew Platt to Adina Cox WEW000550-000551 **(256-259)**;
 17. 04/28/2018 Email from Andrew Platt to Boyd Martin re: Andrew's contact information WEW000552 **(260)**;
 20. 12/05/2017 Andrew.platt@ls.legal email to Jeremy Sawatzky re referral for employment attorney WEW000129-000133 **(292-296)**;
 21. 02/2018 L&S Counselors, Ltd. Invoice #121 issued to Rose Cordova (using Whitney Ranch address) forwarded by Rose Cordova to Woods Erickson & Whitaker LLP WEW000399-000400, 05/08/2018 Woods Erickson & Whitaker LLP Invoice (redacted) to Rosa Cordova WEW000401 **(297-299)**;
 22. L&S Counselors Ltd Invoice format (using Warm Springs address) forwarded to

- WEW email server WEW000002 L&S Counselors Payment Options (using Boulder City address) forwarded to WEW email server WEW000003 **(300-301)**;
23. L&S Counselors website printout WEW000004-000007 **(302-305)**;
24. Client Lists PLATT 2138-2146 **(306-314)**;
26. 04/26/2018 Commercial Registered Agent Registration Statement of Change of Address for R. Glen Woods (deceased 4/1/2018) filed by Andrew Platt WEW000392 **(317)**;
27. 05/10/2015 Hunter's Fax with Attachments WEW000519-000530 List of entities for which Platt changed resident agent address **(318-329)**;
29. 06/21/2016 Matt Johnson a/k/a Farjad Fani engagement letter with Woods Erickson & Whitaker LLP WEW000027 WEW correspondence to Matt Johnson re FarjadFani.com LLC corporate renewal WEW000028-000033 **(343-349)**;
32. 12/01/2016 Husslein engagement agreement with Woods Erickson & Whitaker LLP WEW000077-000078 **(359-360)**;
36. L&S Billings for Identical Clients WEW012073-012101 PLATT002107-002137 **(373-432)**;
37. Platt's Responses to Plaintiff's First Set of Interrogatories (April 16, 2019) **(433-449)**;
38. Platt's Supplemental Responses to Plaintiff's First Set of Interrogatories (May 6, 2019) **(450-452)**;
39. Platt's Second Supplemental Responses to Plaintiff's First Set of Interrogatories (July 30, 2019) **(453-455)**; and
40. Kent and Andrew Text Messages PLATT000594-000601 **(456-460)**

DATED this 5th day of October, 2021.

GERRARD COX LARSEN

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Attorneys for Appellee, Woods & Erickson, LLP

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of GERRARD COX LARSEN, and that on the 5th day of October, 2021, I served a copy of **APPELLEE'S DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD**, as follows:

a. **Electronically Mailed by ECF System:**

DOUGLAS D. GERRARD on behalf of Plaintiff WOODS & ERICKSON, LLP
Dgerrard@gerrard-cox.com; kjohnson@gerrard-cox.com; emedellin@gerrard-cox.com,
Kgonzaless@Gerrard-Cox.com; Kjohnson@Gerrard-Cox.com; Jlangeveld@Gerrard-Cox.com; Fbiedermann@Gerrard-Cox.com; gmlne@gerrard-cox.com

MATTHEW L. JOHNSON on behalf of Defendant ANDREW B. PLATT
annabelle@mjohnsonlaw.com, johnson@mjohnsonlaw.com; kelcie@mjohnsonlaw.com

b. **USPS First Class Mail served to:**

ANDREW B PLATT
Wavetronix
1827 W 650 N
Springville, UT 84663



Kanani Gonzales, an employee of
GERRARD COX & LARSEN